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*Attorneys for Huawei Technologies Co., Ltd.,
Huawei Device USA, Inc., Huawei Technologies
USA, Inc., and HiSilicon Technologies Co. Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

HUAWEI TECHNOLOGIES CO., LTD.,
HUAWEI DEVICE USA, INC., and
HUAWEI TECHNOLOGIES USA, INC.,

Plaintiffs / Counterclaim-Defendants,
v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants / Counterclaim-Plaintiffs,

and

SAMSUNG RESEARCH AMERICA,

Defendant,
v.

HISILICON TECHNOLOGIES CO., LTD.,
Counterclaim-Defendant.

Case No. 16-cv-02787-WHO

**DECLARATION OF JOHN W. MCBRIDE
IN SUPPORT OF HUAWEI'S REPLY IN
SUPPORT OF ITS MOTION FOR
SUMMARY JUDGMENT**

Hearing Date: August 8, 2018
Time: 2:00 p.m.
Location: Courtroom 2, 17th Floor
Judge: Hon. William H. Orrick

1 I, John W. McBride, declare:

2 1. I am an attorney at the law firm of Sidley Austin LLP, counsel for Plaintiffs Huawei
3 Technologies Co., Ltd., Huawei Device USA, Inc. and Huawei Technologies USA, Inc., and
4 Counterclaim-Defendant HiSilicon Technologies Co., Ltd. (collectively, "Huawei"). I am a
5 member in good standing of the State Bar of Illinois, and I am admitted pro hac vice to practice in
6 the Northern District of California. I submit this declaration in support of Huawei's Reply In
7 Support of Its Motion for Summary Judgment. I have personal knowledge of the facts stated herein
8 and, if called as a witness, could and would testify thereto.

9 2. Attached hereto as Exhibit 44 is a true and correct copy of additional excerpts from
10 the Expert Report of Eric Stasik Regarding ETSI and Standards Setting Matters, submitted in Apple
11 Inc. v. Samsung Electronics Co., Ltd. et. al., Case No. 11-cv-01846-LHK (N.D. Cal. Mar. 16,
12 2012). This exhibit is based off a Samsung production document, Bates numbered SAMSUNG-
13 HNDCA-000410118-44.

14 3. Attached hereto as Exhibit 45 is a true and correct copy of additional excerpts from
15 the transcript of the deposition Hojin Chang, conducted on March 2, 2018.

16 4. Attached hereto as Exhibit 46 is a true and correct copy of excerpts from the
17 transcript of the deposition of Gregory Leonard, conducted June 20, 2018.

18 5. Attached hereto as Exhibit 47 is a true and correct copy of excerpts from the
19 deposition of Ilseok Jang, conducted March 6, 2018.

20 6. Attached hereto as Exhibit 48 is a true and correct copy of a License Terms chart,
21 marked as Exhibit 675 at the deposition of Ilseok Jang, conducted March 6, 2018. This exhibit is a
22 Huawei production document with Bates numbered HW_Samsung_00231242-44.

23 7. Attached hereto as Exhibit 49 is a true and correct copy of a letter from Xuxin Cheng
24 to Hojin Chang, dated June 5, 2017, marked as Exhibit 684 at the deposition of Ilseok Jang,
25 conducted March 6, 2018. This exhibit is a Huawei production document with Bates numbered
26 HW_Samsung_00697325-26, HW_Samsung_00697338.

27 8. Attached hereto as Exhibit 50 is a true and correct copy of excerpts from Samsung's
28 Objections & Responses to Huawei's First Set of Requests for Production (1-128), served

1 September 29, 2016.

2 9. Attached hereto as Exhibit 51 is a true and correct copy of excerpts from Samsung's
3 Supplemental Objections & Responses to Huawei's Interrogatories (1-3, 5-9, 12-16, 19-25), served
4 March 9, 2018.

5 10. Attached hereto as Exhibit 52 a webpage screenshot taken from URL
6 <http://www.dictionary.com/browse/indicate>, accessed July 23, 2018.

7 11. Attached hereto as Exhibit 53 is a true and correct copy of a webpage screenshot
8 taken from URL <https://www.merriam-webster.com/dictionary/indicate>, accessed July 23, 2018.

9 I declare under penalty of perjury under the laws of the United States of America that the
10 foregoing is true and correct. Executed on July 24, 2018 in Chicago, IL.

11 /s/ John W. McBride
12 John W. McBride
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